

May 11, 2020

**Via CM/ECF**

The Honorable Karen B. Owens  
United States Bankruptcy Court  
District of Delaware  
824 N. Market Street  
Wilmington, Delaware 19801

*Re: In re Dura Automotive Systems, LLC, et al., Case No. 19-12378 (KBO)*

The Official Committee of Unsecured Creditors (the “Committee”) respectfully submits this letter pursuant to this Court’s May 5, 2020 letter to counsel regarding *Protocol for May 12, 2020 Hearing – Presentation of Evidence* [Docket No. 951] (the “Court’s Letter”). In response to the Court’s Letter the Committee respectfully submits as follows:

Regarding Testimony

1. The Committee plans to sponsor John Greene of Bardin Hill Investment Partners LP (the “Witness”).
2. Because the Witness is not within the Committee’s control, the Witness’s direct testimony will not be presented by declaration.
3. The Witness is located in New York, New York.
4. The Witness will be testifying from home.
5. No other individual will be in the room with the Witness during his testimony.
6. The Witness will have the following documents with him during his testimony:
  - a. All exhibits provided by the Debtors in the *Debtors’ Witness and Exhibit List for May 12, 2020 Hearing* [Docket No. 983].
  - b. All exhibits listed below.
7. The Debtors, through their counsel, Kirkland & Ellis LLP, have reserved the right to cross examine the Witness.
8. The Committee reserves the right to examine any witness called or listed by any party—or to call additional witnesses for rebuttal purposes.

Regarding Documentary Evidence

The Committee intends to submit the following as exhibits in connection with the May 12, 2020 Hearing.

1. Joint Chapter 11 Plan of Dura Automotive Systems, LLC and its Debtor Affiliates [Docket No. 572].
2. Declaration of Jill Frizzley, Independent Manager of Dura Automotive Systems, LLC, and Dura Operating, LLC, in Support of the Proposed European Transaction and the North American Transaction [Docket No. 980].
3. Declaration of James E. Riedy, Chief Financial Officer and Executive Vice President of Dura Automotive Systems, LLC, in Support of the Proposed European Transaction and the North American Transaction [Docket No. 978].
4. Declaration of Mark Berger, Managing Director at Portage Point Partners, LLC, in Support of the Proposed European Transaction and the North American Transaction [Docket No. 979].
5. Declaration of Richard W. Morgner in Support of the Proposed European Transaction and the North American Transaction [Docket No. 977].
6. Notice of Debtors' Entry into Stock and Asset Purchase Agreement for Sale of Debtors' European Business [Docket No. 894]
7. Notice of Debtors' Entry into Stock and Asset Purchase Agreement for Sale of Debtors' North American Business [Docket No. 931].
8. Motion of the Official Committee of Unsecured Creditors for Entry an Order Granting Derivative Standing and Authority to Prosecute and Settle Claims on Behalf of the Debtors' Estate [Docket No. 880-1].
9. Official Committee of Unsecured Creditors' Complaint [Docket No. 880-1].
10. First Request for Production of Documents by the Official Committee of Unsecured Creditors to the Debtors.
11. Second Request for Production of Documents by the Official Committee of Unsecured Creditors to the Debtors.
12. March 9, 2020 Letter from Bill Arnault to Justin Kattan advising that that prepetition, the Debtors assessed potential claims and causes of action against various parties, including the Debtors' Prepetition Term Loan Secured Parties and Prepetition ABL Secured Parties.
13. The Committee reserves the right to use exhibits introduced by any other party at the May 12, 2020 Hearing.

The Committee has made its best effort to identify all exhibits that it intends to use at the Hearing, and the Committee reserves the right to add additional exhibits as circumstances require, and will supplement this submission as needed. The Committee also reserves the right to use additional documents for impeachment.

Very truly yours,

/s/ Justin N. Kattan

Justin N. Kattan